

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

TONAE BOLTON,	)	Case No. 1:23-CV-01214-CAB
	)	
Plaintiff,	)	JUDGE CHRISTOPHER A. BOYKO
	)	
v.	)	
	)	<b><u>REPORT OF PARTIES' PLANNING</u></b>
UNIVERSITY HOSPITALS HEALTH	)	<b><u>MEETING UNDER FED. R. CIV. P. 26(f)</u></b>
SYSTEMS, INC., <i>et al.</i>	)	<b><u>AND L.R. 16.3(b)</u></b>
	)	
Defendants.	)	

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16.3(b), a meeting was held on September 12,

2023, and was attended by:

- Taurean Shattuck, counsel for Plaintiff, Tonae Bolton, and;
- Ashley Manful, counsel for Defendants University Hospitals Health Systems, Inc. and

Terri Ann Williams

2. The parties:

\_\_\_\_\_ have exchanged the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1) and the Court's prior order;

\_\_\_\_\_ X will exchange such disclosures by September 29, 2023;

\_\_\_\_\_ have not been required to make initial disclosures.

3. The parties recommend the following track:

\_\_\_\_\_ Expedited      X Standard      \_\_\_\_\_ Complex

\_\_\_\_\_ Administrative      \_\_\_\_\_ Mass Tort

4. Pursuant to Local Rule 5.1(c) all documents must be electronically filed absent a showing of good cause.

5. This case is suitable for one or more of the following Alternate Dispute Resolution

(ADR) mechanisms:

Early Neutral Evaluation  Mediation  Arbitration

Case is not suitable for ADR at this time but may be after discovery.

Case is not suitable for ADR at any time.

6. The parties  do /  do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

7. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery: The Parties will exchange interrogatories, requests for admission, and document requests, and take depositions on matters relevant to Plaintiff's claims and Defendant's defenses. The parties may additionally seek documents and/or medical records with subpoenas. The Parties agree there may be limited discovery of electronically stored information, as to some emails or other electronic communications.

(b) Non-Expert Discovery cut-off date: March 15, 2024

(c) Plaintiff's expert report due date: May 31, 2024

(d) Defendant's expert report due date: June 28, 2024

(e) Expert's discovery cut-off date: July 31, 2024

The Parties request that the Court permit limited expert discovery on the issue of Plaintiff's damages and mitigation thereof after the Court rules on motion(s) for summary judgment.

7. Recommended cut-off date for amending the pleadings and/or adding additional parties: October 13, 2024

8. Recommended dispositive motion date: April 19, 2024

10. Other matters for the attention of the Court: N/A

Respectfully submitted,

/s/ Taurean J. Shattuck (per phone approval)

Taurean J. Shattuck (0097364)  
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/s/ Ashley M. Manfull

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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 12, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Ashley M. Manfull

Ashley M. Manfull (0071372)